

Rey J. Soto-Lopez
Name 437160
Prison Number
ANCHORAGE CORRECTIONAL COMPLEX WEST
Place of confinement
1300 E 4TH AVE
Mailing address
ANCHORAGE, AK 99501
City, State, Zip
Telephone

RECEIVED

MAR 18 2021

CLERK, U.S. DISTRICT COURT
ANCHORAGE, AK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

Rey J. Soto-Lopez
(Enter full name of plaintiff in this action)

Plaintiff,

vs.

Case No. 3:21-cv-00061-JMK
(To be supplied by Court)

ELIEN FERRAR

HOWARD, TREVOR

ASAP TOWING INC, BECKIRA

(Enter full names of defendant(s) in this action.
Do NOT use *et al.*)

Defendant(s).

PRISONER'S
COMPLAINT UNDER
THE CIVIL RIGHTS ACT
42 U.S.C. § 1983

A. Jurisdiction

Jurisdiction is invoked under 28 U.S.C. § 1343(a)(3).

B. Parties

1. Plaintiff: This complaint alleges that the civil rights of REY J. SOTO LOPEZ
(print your name)

who presently resides at ANCHORAGE CORRECTIONAL COMPLEX
(mailing address or place of confinement)

were violated by the actions of the individual(s) named below.

2. Defendants (Make a copy of this page and provide same information if you are naming more than 3 defendants):

Defendant No. 1, EILEEN Farrer is a citizen of ALASKA, and is employed as a Parole/Probation officer.
(state) (name) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☒ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 2, A HOWARD, TREVOR is a citizen of ALASKA, and is employed as a ALASKA STATE TROOPERS.
(state) (name) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 3, ASAP TOWING & TRUCK is a citizen of ALASKA, and is employed as a TOW TRUCK driver ASAP TOWING INC
(state) (name) (defendant's government position/title) SOLDOWN

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

*****REMINDER*****

**You must exhaust your administrative remedies before your claim can go forward.
THE COURT MAY DISMISS ANY UNEXHAUSTED CLAIMS.**

C. Causes of Action (You may attach additional pages alleging other causes of action and facts supporting them if necessary. Make copies of page 5 and rename them pages 5A, 5B, etc. and rename the claims, "Claim 4," "Claim 5, etc.").

Claim 1: On or about 3.24.19, my civil right to

(Date)

DUE PROCESS, Freedom From unreasonable Searches and Seizures
(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List **only one** violation.)

was violated by Eileen Farrar, 1ST HOWARD, TREVOR, ASAD ROWING IRABER
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 1. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 1.):

(SEE COMPLAINT) ATTACHMENT 5A

R.D EILEEN FARRAR

Claim 2: On or about 3.24.19, my civil right to

4th Amendment and 14th Due Process of Law
(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List **only one** violation.)

was violated by EILEEN FARRAR, HOWARD TREW, ASAP DOWING BEEK, JR
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 2. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 2.):

SEE Supplement ATTACHMENT

Complaint. 5B AST HOWARD TREW

Claim 3: On or about 3.24.19, my civil right to

4th and 14th Amendment (Date)
(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List **only one** violation.)

was violated by AST HOWARD, TREVOR and ASAP towing
(Name of the specific Defendant who violated this right)

break,
IRA

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

SEE Supplement Attachment

Complaint.

5 C ASAP towing

BEK, RA

D. Previous Lawsuits

1. Have you begun other lawsuits in **state or federal court** dealing with the **same facts** involved in this action, **or otherwise relating to your imprisonment?** ☐ Yes ☒ No

2. If your answer is "Yes," describe each lawsuit.

a. Lawsuit 1:

Plaintiff(s): _____

Defendant(s): _____

Name and location of court: _____

Docket number: _____ Name of judge: _____

Approximate date case was filed: _____ Date of final decision: _____

Disposition: ☐ Dismissed ☐ Appealed ☐ Still pending

Issues Raised: _____

b. Lawsuit 2:

Plaintiff(s): _____

Defendant(s): _____

Name and location of court: _____

Docket number: _____ Name of judge: _____

Approximate date case was filed: _____ Date of final decision: _____

Disposition: ☐ Dismissed ☐ Appealed ☐ Still pending

Issues Raised: _____

3. Have you filed an action in federal court that was dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted?

☐ Yes ☒ No

If your answer is "Yes," describe each lawsuit on the next page.

Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:

- a. Defendant(s): _____
- b. Name of federal court _____ Case number: _____
- c. The case was dismissed as: ___ frivolous, ___ malicious and/or ___ failed to state a claim
- d. Issue(s) raised: _____
- e. Approximate date case was filed: _____ Date of final decision: _____

Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:

- a. Defendant(s): _____
- b. Name of federal court _____ Case number: _____
- c. The case was dismissed as: ___ frivolous, ___ malicious and/or ___ failed to state a claim
- d. Issue(s) raised: _____
- e. Approximate date case was filed: _____ Date of final decision: _____

Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:

- a. Defendant(s): _____
- b. Name of federal court _____ Case number: _____
- c. The case was dismissed as: ___ frivolous, ___ malicious and/or ___ failed to state a claim
- d. Issue(s) raised: _____
- e. Approximate date case was filed: _____ Date of final decision: _____

4. **Are you in imminent danger of serious physical injury?** ___ Yes ☒ No

If your answer is "Yes," please describe how you are in danger, without legal argument/authority: _____

F. Request for Relief

Plaintiff requests that this Court grant the following relief:

1. Damages in the amount of \$ SEE ATTACHMENT "Amount Entitled too."
2. Punitive damages in the amount of \$ _____
3. An order requiring defendant(s) to _____
4. A declaration that _____
5. Other: _____

Plaintiff demands a trial by jury. ☒ Yes ☐ No

DECLARATION UNDER PENALTY OF PERJURY

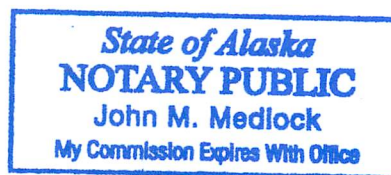
The undersigned declares under penalty of perjury that s/he is the plaintiff in the above action, that s/he has read the above civil rights complaint and that the information contained in the complaint is true and correct.

Executed at ANCHORAGE on 3/2/21
(Location) (Date)

Ray Soto
(Plaintiff's Signature)

Original Signature of Attorney (if any) (Date)

Attorney's Address and Telephone Number



REY J. JATO-LOPEZ 137160

ANCHORAGE CORRECTIONAL COMPLEX WEST
1300 EAST 4TH AVE
ANCHORAGE, AK, 99501

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL™



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ANCHORAGE AK 99513

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Court Clerk
United States District Court
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Anchorage, Alaska, 99513